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STATE OF ALASKA
OFFICE OF THE GOVERNOR
JUNEAU

November 15, 2004

Content Analysis Team
ATTN: Roadless State Petitions
U.S.D.A. Forest Service
P.O. Box 221090
Salt Lake City, UT 84122

Re: Proposed Rulemaking – Special Areas; State Petitions for Inventoried
Roadless Area Management, 69 Fed. Reg. 42636 (July 16, 2004)

Dear Chief Bosworth:

The State of Alaska appreciates the opportunity to submit comments on the Forest Service's proposed rulemaking to replace the current roadless rule with a process for governors to petition to establish or modify management of inventoried roadless areas. Alaska strongly supports elimination of the current rule and adoption of the petition process.

As we understand it, the current (and currently enjoined) roadless rule would be replaced by the new petition process. The new rule would establish an 18 month period in which the governor of a state containing inventoried roadless areas could file a petition seeking specific management prescriptions for identified areas.

Simultaneously with publication of the proposed rule, the Forest Service reinstated an interim directive (ID) prescribing that until a forest-wide road analysis is completed and incorporated into a land management plan, inventoried roadless areas will generally be managed to preserve their roadless characteristics. 69 Fed. Reg. 42648 (July 16, 2004). Upon adoption or amendment of such a land management plan, inventoried roadless areas will be managed in accordance with the plan. Because both the Tongass and Chugach forest plans have been revised and each included a forest-wide road analysis, the interim directive does not apply to Alaska's national forests. Therefore, the consequence of these combined actions in Alaska is that the Tongass National Forest and the Chugach National Forest will be managed as prescribed in their respective forest plans. The state supports this outcome over the previous rules and directives.

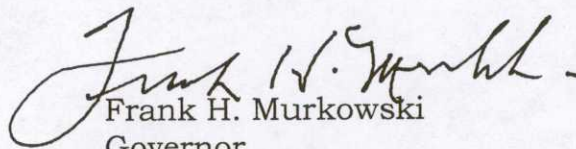
Content Analysis Team
November 15, 2004
Page 2

Alaska contains more than 25 percent of the inventoried roadless area acreage in the nation. Ninety percent of the Tongass National Forest and almost 99 percent of the Chugach National Forest are roadless. Alaska strongly opposed, and filed suit to permanently enjoin, the current roadless rule. Alaska has always maintained that the current rule violates the Alaska National Interest Lands Conservation Act, 16 U.S.C. 3101, *et seq.*, as well as generally applicable federal statutes including the National Environmental Policy Act, the National Forest Management Act, and the Wilderness Act.

The scientific, and public, forest planning process, which considers local, state, and national input on social, economic, and ecological values, is the appropriate means for making management decisions for our national forests. We commend the Forest Service's recognition of this in proposing the new rule.

Thank you for your consideration.

Sincerely yours,



Frank H. Murkowski
Governor